

#18

**United States District Court  
Southern District Of New York**

Melinda Serin, Judson Russ, Long Soui Lim,  
Peri Kettler, Gordon Redner, and Thomas J. Smith,

Plaintiffs

v.

Northern Leasing Systems, Inc., Jay Cohen,  
Rich Hahn, and Sara Krieger

Defendants

06-Civ-1625  
(Hon. Gwin, J.)

**PLAINTIFFS' DISCLOSURES  
UNDER RULE 26, FED.R.CIV.P.**

1. Rule 26(a)(1)(A)(I) (" the name and, if known, the address and telephone number of each individual likely to have discoverable information — along with the subjects of that information — that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment"):
  - a. Ms. Melinda Serin, 429 N Street SW, Apt. 501, Washington, DC 20024. The subject of discoverable information from Ms. Serin is facts asserted in the amended Complaint.
  - b. Mr. Judson Russ, 14818 Via Winghurst Court, Orlando, FL 32828. The subject of discoverable information from Mr. Russ is facts asserted in the amended Complaint.
  - c. Mr. Long Soui Lim, 1135 Onyx Way, Big Bear City, CA 92314. The subject of discoverable information from Mr. Lim is facts asserted in the amended Complaint.
  - d. Ms. Peri Kettler, 13502 Airport Cutoff Road, Port Townsend, WA 98368-9320.

The subject of discoverable information from Ms. Kettler is facts asserted in the amended Complaint.


- e. Ms. Gordon Redner, 322 Linklea Dr., Duncanville, TX 75137. The subject of discoverable information from Mr. Redner is facts asserted in the amended Complaint.
  - f. Mr. Thomas J. Smith, N24 W22248 Ridgewood Court, Waukesha Wisconsin 53186. The subject of discoverable information from Mr. Redner is facts asserted in the amended Complaint.
  - g. Defendant's employees, including without limitation Jay Cohen; Rich Hahn; Sara Krieger; Lina Kravic; Sam Buono. The addresses and telephone numbers of all these persons are known to Defendant. Defendant's employees would have discoverable information about the facts asserted in the Amended Complaint.
  - h. Plaintiff reserves the right to supplement this response if appropriate.
2. Rule 26(a)(1)(A)(ii) ("a copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment"):
- a. Communication between Plaintiffs and Defendant Northern Leasing Systems, Inc., and/or its employees;
  - b. Legal proceedings commenced by Defendant, including pleadings, court filings and related documents;
  - c. Communication between Plaintiffs and Defendant's agents/representatives;

- d. Plaintiff reserves the right to supplement this response if appropriate.
- 3. Rule 26(a)(1)(A)(iii) (“a computation of each category of damages claimed by the disclosing party — who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered”)
  - a. Compensation for injuries inflicted, including transportation and conveyance expenses, boarding and lodging expenses, emotional distress, annoyance, inconvenience, and all damages compensable under the law;
  - b. Compensation for injuries inflicted by Defendants’ adverse entries in Plaintiffs’ individual credit reports;
  - c. Plaintiffs reserve the right to supplement this response if appropriate.
- 4. Rule 26(a)(1)(A)(iv) (“for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment”)

Not applicable.

Dated: New York, New York  
January 21, 2010

**Chittur & Associates, P.C.**

  
By: Krishnan Chittur, Esq. (KC9258)  
286 Madison Avenue Suite 1100  
New York, New York 10017  
Tel: (212) 370-0447  
Email: [kchittur@chittur.com](mailto:kchittur@chittur.com)

**RECEIVED**

*WSPS*

JAN 26 2010

MOSES & SINGER LLP

ADDRESSED TO:

RECEIVED BY:

*ROL*